



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

September 19, 2003

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

TO: Interested Parties / Applicant

RE: The Andersons Clymers Operations / 017-16600-00023

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this approval is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER-MOD.dot 9/16/03

September 19, 2003

Ms. Melissa Farrington
The Andersons Clymers Operations
P.O. Box 119
Maumee, Ohio 43537

Re: **017-16600-00023**
Minor Permit Revision to
MSOP 017-11404-00023

Dear Ms. Farrington:

The Andersons Clymers Operations was issued a permit on April 14, 2000 for a grain receiving, drying, cleaning, storage and loading operation. A request to modify their existing source permit was received on December 18, 2002. Pursuant to the provisions of 326 IAC 2-6.1-6, the permit is hereby revised as follows:

The Andersons Clymers Operations has submitted an application to remove the 40 CFR 60, Subpart DD requirements that were applied to the existing units and new proposed hopper bottom truck receiving pit under Notice-Only-Change 017-15720-00023, issued on December 10, 2002.

1. Removing the New Source Performance Standards Applied to the Existing Units From the Permit:

The Andersons Clymers Operations has requested that the New Source Performance Standards (NSPS) applied to the existing units under Notice-Only-Change 017-15720-00023 be removed because the existing units were constructed in 1974, prior to the 40 CFR 60, Subpart DD, 60.300(b) applicable date of August 3, 1978.

Upon review of the permit and the notes associated with the review, it is determined that the NSPS were applied to the existing units because the source stated that the units were constructed in 1994.

However, since the units were actually constructed in 1974 with Andersons Clymers Operations only purchasing the terminal elevator in 1994 and the units have not been modified, it is determined that the NSPS should not have been applied to the existing units.

Therefore, the affected requirements shall be removed.

2. Removing the New Source Performance Standards Applied to the Receiving Pit Proposed under Notice-Only-Change 017-15720-00023:

The Andersons Clymers Operations has also requested the removal of the NSPS requirements associated with the grain receiving pit issued under Notice-Only-Change 017-15720-00023 because the hopper bottom truck receiving pit proposed in this application is not a modification due to the fact that there has not been an increase in the hourly grain handling capacity nor the permanent storage capacity.

Pursuant to 40 CFR 60, Subpart DD, "Standards of Performance for Grain Elevators", Section 60.300, Paragraph (a), the provisions of this subpart apply to each affected facility at any grain terminal elevator or any grain storage elevator, except as provided under 60.304(b). The affected facilities are each truck unloading station, truck loading station, barge and ship unloading station, barge and ship loading station, railcar loading station, railcar unloading station, grain dryer, and all grain handling operations.

Pursuant to 40 CFR 60, Subpart DD, Section 60.300, Paragraph (b), any facility under paragraph (a) of this section which commences construction, modification, or reconstruction after August 3, 1978, is subject to the requirements of this part.

Pursuant to 60.304(b), the following physical changes or changes in the method of operation shall not by themselves be considered a modification of any existing facility:

- (1) the addition of gravity loadout spouts to existing grain storage or grain transfer bins;
- (2) the installation of automatic grain weighing scales;
- (3) the replacement of motor and drive units driving existing grain handling equipment; and
- (4) the installation of permanent storage capacity with no increase in hourly grain handling capacity.

Pursuant to 40 CFR 60, Subpart A, Section 60.2, construction means fabrication, erection, or installation of an affected facility.

The grain elevator is determined to be a grain terminal elevator because the permanent capacity is greater than the applicable capacity of 2.5 million U.S. bushels and the source is not an animal food manufacturer, pet food manufacturer, cereal manufacturer, brewery, or livestock feedlot, as specified in 60.301(c).

The receiving pit is a truck unloading station as specified in 60.300(a) that was installed after the 60.300(b) applicable date of August 3, 1978. Therefore, the receiving pit is determined to be an affected facility.

The receiving pit is determined to be construction of an affected facility because it is a new affected facility that was erected and installed, as defined in 40 CFR 60, Subpart A, Section 60.2.

Therefore, the hopper bottom truck receiving pit issued under Notice-Only-Change 017-15720-00023 is determined to be construction of a new affected facility.

60.304(b) does exempt certain "modifications" to "existing" facilities. However, since the receiving pit issued under Notice-Only-Change 017-15720-00023 is determined to be "construction" of a "new" facility, the receiving pit is not exempted under 60.304(b).

Thus, since the hopper bottom truck receiving pit is construction of a new affected facility, the requirements of 40 CFR 60, Subpart DD apply to each affected facility at any grain terminal elevator or any grain storage elevator which commences construction, modification, or reconstruction after August 3, 1978, and the receiving pit is not one of the exemptions specified in 60.304(b), it is determined that the NSPS requirements of 40 CFR 60, Subpart DD that were applied to the receiving pit under Notice-Only-Change 017-15720-00023 still apply and are correct. These requirements will not be removed.

Removing the NSPS applied to the existing units under Notice-Only-Change 017-15720-00023 is considered a correction in applicability, not a relaxation of applicable requirements because the requirements should not have been applied at all.

The NSPS requirements applied to the existing units were incorporated into the permit via a Notice-Only-Change pursuant to 326 IAC 2-6.1-6(d) with no public notification.

Since no public notification was required to incorporate the applicable requirements, no public notification is required to remove the requirements. Thus, the proposed revision is not a Significant Permit Revision under 326 IAC 2-6.1-6(i).

Further, there are no provisions under a Notice-Only-Change under 326 IAC 2-6.1-6(d) that allow affected permit requirements to be removed.

Therefore, the affected NSPS requirements shall be removed via a Minor Permit Revision pursuant to 326 IAC 2-6.1-6(g)(1).

To remove the affected requirements from the permit, the following changes shall be made. All added information is indicated in bold type. All deleted information is struck-out.

1. Condition D.1.2:

Condition D.1.2 shall be removed because the NSPS requirements no longer apply.

~~D.1.2 Particulate Matter (PM) Emission Limitations, Process Emissions [326 IAC 12] [40 CFR 60.302(b)]~~

~~Pursuant to 40 CFR 60.302(b), on and after the date the performance test required under 60.8 is complete, the owner or operator shall limit the process emissions as follows:~~

- ~~(a) The particulate matter (PM) emissions from the truck dump hopper, rail/truck dump hopper, grain cleaner, and grain legs, each, shall be limited to less than or equal to 0.01 grains per dry standard cubic foot (dscf).~~
- ~~(b) The opacity from the truck dump hopper, rail/truck dump hopper, grain cleaner, and grain legs, each, shall be limited to zero percent (0%) opacity.~~

2. Condition D.1.3:

Condition D.1.3 (now Condition D.1.2) shall be revised as follows to remove the 60.302(c) NSPS requirements that no longer apply to the existing railcar/truck loading station.

~~D.1.32 Particulate Matter (PM) Emission Limitations, Loading and Unloading Processes [326 IAC 12] [40 CFR 60.302(c)]~~

~~Pursuant to 40 CFR 60.302(c), on and after the 60th day of achieving maximum production rate, but no later than 180 days after initial startup, the owner or operator shall limit the loading and unloading emissions as follows:~~

- ~~(a) The opacity from the hopper bottom truck grain receiving process opacity shall be limited to less than or equal to five percent (5%).~~
- ~~(b) The railcar/truck loading station opacity shall be limited to less than or equal to ten percent (10%).~~

3. Condition D.1.3 from the Original Permit:

Since the NSPS testing requirements no longer apply to the existing source units, the testing requirements of Condition D.1.3 of the original permit (now Condition D.1.4) that were removed in Notice-Only-Change 017-15720-00023, shall be added back into the permit because these requirements now apply again.

However, this condition shall be revised to reflect the fact that no initial testing is required of the existing units but that the OAQ does reserve the right to require stack testing of "all" affected units if deemed necessary.

D.1.4 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test any of the emission units listed in this Section except the hopper bottom truck grain receiving process at this time. However, the IDEM may require compliance testing of all emission units listed in this Section, including the hopper bottom truck grain receiving process when deemed necessary to determine if the emissions unit is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

4. Condition D.1.5:

Condition D.1.5 shall be revised as follows to remove the 60.303 test method and procedure requirements associated with the existing equipment.

D.1.5 Testing Requirements [326 IAC 12] [40 CFR 60.303(a)]

~~Pursuant to 40 CFR 60.303(a), the owner or operator shall conduct performance tests on the truck dump hopper, rail/truck dump hopper, railcar/truck loading site, grain cleaner, and grain legs, and hopper bottom truck grain receiving process, pursuant to the requirements of 40 CFR 60.8.~~

~~Unless otherwise specified, Said tests shall be conducted utilizing the following test methods and procedures as applicable, except as specified in 40 CFR 60.8(b).~~

~~(a) Method 5 or Method 17 shall be used to determine the particulate matter concentration and volumetric flow rate of the effluent gas.~~

~~If Method 5 is used to determine the particulate matter concentration and volumetric flow rate of the effluent gas, the sampling time and sample volume for each run shall be at least 60 minutes and 60 dscfm, with the probe and filter holder being operated without heaters.~~

~~(b) Method 2 shall be used to determine the ventilation volumetric flow rate.~~

~~(c) Method 9 and the procedures in 40 CFR 60.11 shall be used to determine opacity.~~

4. Condition Renumbering:

All conditions have been renumbered accordingly.

5. Table of Contents:

The Table of Contents has been revised to reflect the changes to the Conditions of Section D.1.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this letter and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please phone (800) 451-6027 and ask for Scott Fulton or extension (3-5691), or dial (317) 233-5691 and ask for Scott Fulton.

Sincerely,

Original Signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

SDF

cc: File - Cass County
U.S. EPA, Region V
Cass County Health Department
Air Compliance Section Inspector - Marc Goldman
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

**The Andersons Clymers Terminal
County Roads 300S and 350W
Clymers, Indiana 46947**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 017-11404-00023	Date Issued: 4-14-00
Issued by: Paul Dubenetzky, Branch Chief, Office of Air Quality	
First Notice Only Change No.: 017-15720-00023	Date Issued: 12/10/02
First Minor Permit Revision No.: 017-16600-00023	Affected Pages: 2, 3, 16, 17, and 18
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issued: September 19, 2003

TABLE OF CONTENTS

A SOURCE SUMMARY

- A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]
- A.2 Emission Units and Pollution Control Equipment Summary

B GENERAL CONSTRUCTION CONDITIONS

- B.1 Permit No Defense [IC 13]
- B.2 Definitions
- B.3 Effective Date of the Permit [IC 13-15-5-3]
- B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]
- B.5 Modification to Permit [326 IAC 2]
- B.6 Minor Source Operating Permit [326 IAC 2-6.1]
- B.7 NSPS Reporting Requirements

C SOURCE OPERATION CONDITIONS

- C.1 PSD Minor Source Status [326 IAC 2-2][40 CFR 52.21]
- C.2 Preventive Maintenance Plan [326 IAC 1-6-3]
- C.3 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]
- C.4 Inspection and Entry [326 IAC 2-7-6(2)]
- C.5 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]
- C.6 Permit Revocation [326 IAC 2-1-9]
- C.7 Opacity [326 IAC 5-1]
- C.8 Fugitive Dust Emissions [326 IAC 6-4]
- C.9 Performance Testing [326 IAC 3-6][326 IAC 2-1.1-11]
- C.10 Compliance Monitoring [326 IAC 2-1.1-11]
- C.11 Maintenance of Monitoring Equipment [IC 13-14-1-13]
- C.12 Monitoring Methods [326 IAC 3]
- C.13 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 1-6]

Record Keeping and Reporting Requirements

- C.14 Malfunctions Report [326 IAC 1-6-2]
- C.15 Annual Emission Statement [326 IAC 2-6]
- C.16 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-3]
- C.17 General Record Keeping Requirements [326 IAC 2-6.1-2]
- C.18 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]
- C.19 Annual Notification [326 IAC 2-6.1-5(a)(5)]

D.1 Emissions unit OPERATION CONDITIONS - Grain Terminal

Emission Limitations and Standards

- D.1.1 Particulate Matter (PM) [326 IAC 6-3]
- D.1.2 Particulate Matter (PM) Emission Limitations, Unloading Processes [326 IAC 12] [40 CFR 60.302(c)]
- D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

Compliance Determination Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

- D.1.4 Testing Requirements [326 IAC 2-1.1-11]
- D.1.5 Testing Requirements [326 IAC 12] [40 CFR 60.303]
- D.1.6 Particulate Matter (PM)

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.7 Baghouse Inspections

D.1.8 Broken or Failed Bag Detection

Annual Notification
Malfunction Report

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description

- (1) One truck dump hopper enclosed on 3 sides with particulate emissions controlled by the # 1 baghouse;
- (2) One rail/truck dump hopper enclosed on 2 sides with particulate emissions controlled by the # 1 baghouse;
- (3) One rail car/truck loading site with no emission controls;
- (4) One Berico 3,000 bushel per hour natural gas fired 16.5 million (MM) British thermal units (Btu) per hour burner with screen house enclosure;
- (5) One grain cleaner rated at 15,000 bushels per hour with particulate emissions controlled by the # 2 baghouse;
- (6) 4 million bushel grain storage capacity with no emission controls;
- (7) 400,000 bushel grain storage capacity with particulate emissions controlled by the # 2 baghouse; and
- (8) Two 7,500 bushel per hour capacity grain legs with particulate emissions controlled by the # 2 baghouse.
- (9) One (1) hopper bottom truck grain receiving process, consisting of one (1) enclosed drag conveyor with a maximum design throughput of 1,000,000 bushels of corn and soybeans per year, with particulate matter (PM) and PM10 emissions controlled by one (1) conveyor enclosure.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.1.1 Particulate Matter (PM) [326 IAC 6-3]

- (a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the grain dryer (ID No. Berico Dryer) shall not exceed 49.54 pounds per hour when operating at a process weight rate of 84 tons per hour.
- (b) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the grain receiving operation shall not exceed 40.13 pounds per hour when operating at a process weight rate of 30.59 tons per hour.
- (c) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the internal operation shall not exceed 40.13 pounds per hour when operating at a process weight rate of 30.59 tons per hour.
- (d) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the bin loading operation shall not exceed 40.13 pounds per hour when operating at a process weight rate of 30.59 tons per hour.
- (e) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the shipping operation shall not exceed 40.13 pounds per hour when operating at a process weight rate of 30.59 tons per hour.

D.1.2 Particulate Matter (PM) Emission Limitations, Unloading Processes [326 IAC12] [40 CFR 60.302(c)]

Pursuant to 40 CFR 60.302(c), on and after the 60th day of achieving maximum production rate, but no later than 180 days after initial startup, the owner or operator shall limit the opacity from the hopper bottom truck grain receiving process to less than or equal to five percent (5%).

D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section C - Preventive Maintenance Plan, of this permit, is required for this emissions unit and its control device.

Compliance Determination Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.4 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test any of the emission units listed in this Section except the hopper bottom truck grain receiving process at this time. However, the IDEM may require compliance testing of all emission units listed in this Section, including the hopper bottom truck grain receiving process, when deemed necessary to determine if the emissions unit is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.5 Testing Requirements [326 IAC 12] [40 CFR 60.303]

Pursuant to 40 CFR 60.303, the owner or operator shall conduct performance tests on the hopper bottom truck grain receiving process pursuant to the requirements of 40 CFR 60.8.

Unless otherwise specified, the owner or operator shall determine compliance with the opacity limit of Condition D.1.2 utilizing Method 9 and the procedures in 40 CFR 60.11.

D.1.6 Particulate Matter (PM)

The baghouses for PM control shall be in operation at all times when the grain receiving operation, internal operations (which consists of cleaning) and shipping operation are in operation.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.7 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.1.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).